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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ERICA FRASCO, individually and on behalf of all others similarly situated,

Plaintiffs,

V.

FLO HEALTH, INC., META PLATFORMS, INC., GOOGLE, LLC, and FLURRY, INC.,

Defendants.

Case No.: 3:21-cv-00757-JD

DECLARATION OF JAKE BISSELL-LINSK IN SUPPORT OF PLAINTIFFS' MOTION FOR A PRELIMINARY DETERMINATION REGARDING THE AUTHENTICITY AND ADMISSIBILITY OF CERTAIN DOCUMENTS PRODUCED BY FLO HEALTH, INC.

1 I, Jake Bissell-Linsk, pursuant to 28 U.S.C. § 1746, declare and state as follows:

2 1. I am a member of the Bar of the State of New York, admitted *pro hac vice* to this
3 Court for this action, and a partner of the law firm Labaton Keller Sucharow LLP, counsel for
4 Plaintiffs Erica Frasco, Sarah Wellman, Tesha Gamino, Jennifer Chen, and Autumn Meigs
5 (collectively, “Plaintiffs”) and Co-Lead Class Counsel.

6 2. Pursuant to Civil Local Rule 7-5 and Judge Donato’s Standing Order for Civil
7 Cases, I respectfully submit this Declaration in Support of Plaintiffs’ Motion for a Preliminary
8 Determination Regarding the Authenticity and Admissibility of Certain Documents Produced by
9 Flo Health, Inc. (“Flo”).

10 3. Attached as **Exhibit A** to Plaintiffs’ Motion for a Preliminary Determination
11 Regarding the Authenticity and Admissibility of Certain Documents Produced by Flo Health, Inc.
12 is a table describing documents produced by Flo (the “Documents”) in discovery and appendices
13 attaching each of those documents.

14 4. The statements in Exhibit A concerning the information relevant to the authenticity
15 of the Documents are based on my review of the Documents and the associated metadata. For
16 example, where it is stated in Column “Indicia of Authenticity” that a document had a particular
17 filename, I personally reviewed the metadata fields for that document with the given Bates number
18 on a document review platform to verify that filename. I believe, and have no reason to doubt,
19 that the Documents were loaded into that document review platform using standard practices, such
20 that the information available on that document review platform accurately corresponds to the
21 productions Flo made in this case.

22 5. Attached as **Exhibit B** to Plaintiffs’ Motion for a Preliminary Determination
23 Regarding the Authenticity and Admissibility of Certain Documents Produced by Flo Health, Inc.
24 is an index of certain documents cited in Exhibit A to support the authenticity of the Documents
25 listed in Exhibit A and appendices attaching each of those documents.

26 6. Attached as **Exhibit C** to Plaintiffs’ Motion for a Preliminary Determination
27 Regarding the Authenticity and Admissibility of Certain Documents Produced by Flo Health, Inc.
28 is a true and correct copy of the Transcript of the Proceedings held June 26, 2025 before this Court.

1
2 I declare under penalty of perjury that the foregoing is true and correct.
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Executed on this 11th day of July 2025.

5 /s/ Jake Bissell-Linsk
6 Jake Bissell-Linsk
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